

Testimony For Lakin Tire East, West Haven, Connecticut

H.B. 5139 AN ACT CONCERNING EXTENDED PRODUCER RESPONSIBILITY FOR TIRES

Environment Committee Friday, February 25, 2022

My name is David Greenstein, and I am Vice President of Lakin Tire East. I have held this position for over 20 years.

Lakin Tire East has been responsibly recycling discarded tires in the State of Connecticut since 1978. We employ approximately 175 employees and occupy and operate in two buildings in West Haven that equal 100,000 ft.² Over the years, Lakin has invested millions of dollars in transportation equipment and software as well as sophisticated tire shredding equipment.

There are currently two other scrap tire collection entities in the state. Lakin currently disposes of approximately half of the State of Connecticut's annual scrap tire generation of about 3.5 million tires. To put into context Lakin Tire East since its inception has successfully collected and recycled over 50 million tires generated by the State of Connecticut.

Through our words and actions over the past 44 years Lakin Tire has demonstrated a firm commitment to ensuring that all discarded tires are recycled. We know that almost all discarded tires are successfully processed by the recycling system that already exists in Connecticut. We can say with confidence that 99% of discarded tires are recycled and only 1% are dumped illegally.

The problem in CT is not the existing recycling system, it is the illegal acts of a group of tire thieves scavenging through retailers' scrap tire holding bins, selecting the "good tires", and then dumping the rest. I am guessing that you are surprised that there are people that actually do that, but it is a fact, and it is where almost all illegally dumped tires come from.

Creating an EPR system for the tire industry in CT will not stop the illegal actors. A new EPR system may however have unintended consequences and disrupt the current efficient and cost-effective system. For those reasons we oppose the bill as currently drafted. However, we are here to work with this committee and other stakeholders to find a solution for illegally dumped tires.

The proponents of H.B. 5139 are concerned about the tires that are illegally dumped. Municipalities are concerned about the management and cost burden of tires collected and managed at local transfer stations. So are we, but we believe that the extent of the problem must be quantified before the legislature changes the system. Information about the number of illegal dumped tires and the number of tires municipalities are left to manage is anecdotal. To that end we are working with the Housatonic Resource Recovery Authority and their Executive Director to create a data collection system that will be in place next month that would provide all interested parties with data which could be used to determine the scope of the problem and the cost to local communities who end up dealing with unwanted tires. We would welcome the participation in the data collection effort from other solid waste management authorities and or individual municipalities.

With this information, and stakeholders working together over the next nine months, we pledge to come back to the Environment Committee with a legislative proposal to address the costs and burdens to local communities of disposing of discarded tires.

That plan would also include some commonsense legislation to address the illegal actors who dump tires in waterways and other areas around the state. It would include a manifest system that tracks the chain of custody of discarded tires. Such a system would not only continue to ensure the legal disposing of scrap tires but also reduce the illegal activities.

Currently, the State of Connecticut does not have any tire recycling end use opportunities. In fact, the entire New England region is lacking sufficient tire recycling options. The only option today is Tire Derived Fuel. In the past the DEEP has not been a proponent of Tire Derived Fuel. If this option were to be discontinued today the State would have literally no options for its scrap tires.

Lastly, Lakin Tire has successfully worked with DEEP in our efforts to install a tire mulch line. This proposal sets forth the installation of equipment to turn scrap tires into rubber mulch. Lakin Tire's parent company Liberty Tire Recycling is in much need of tire mulch as it is currently in a sold-out position. It is Lakin's hope that DEEP considers the application expeditiously. The proposed mulch line will recycle approximately 4 million tires annually.

This would be the only end use market in the State of Connecticut since the closure of the Exeter Energy Plant.

Thank you for this opportunity to speak before the committee.